

EXHIBIT 4

Stephen H.M. Bloch (#7813)
Laura Peterson (#16135)
Hanna Larsen (#18458)
SOUTHERN UTAH WILDERNESS ALLIANCE
425 East 100 South
Salt Lake City, Utah 84111
Telephone: (801) 486-3161
steve@suwa.org
laura@suwa.org
hanna@suwa.org

*Attorneys for Proposed Defendant-Intervenor
Southern Utah Wilderness Alliance*

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF UTAH
CENTRAL DIVISION, SOUTHERN REGION**

BLUERIBBON COALITION, INC.,

Plaintiff,

v.

**BUREAU OF LAND MANAGEMENT, et
al.,**

Defendants,

and

**SOUTHERN UTAH WILDERNESS
ALLIANCE,**

Proposed Defendant-Intervenor.

Case No. 4:25-cv-00044-AMA-PK

**[PROPOSED] DEFENDANT-
INTERVENOR'S RESPONSE TO
PLAINTIFF'S COMPLAINT**

Judge Ann Marie McIff Allen
Magistrate Judge Paul Kohler

Proposed Defendant-Intervenor Southern Utah Wilderness Alliance (SUWA), through counsel, hereby responds to Plaintiff's Complaint¹ (ECF No. 1) in the above-captioned matter as follows: the aspects of the Bureau of Land Management's Henry Mountains/Fremont Gorge Travel Management Plan challenged by Plaintiff are neither arbitrary nor capricious and are instead supported by substantial evidence.

SUWA also raises the following affirmative defenses:

1. Plaintiff fails to state a claim upon which relief may be granted for all or some of the claims in the Complaint;
2. All or some of the claims in Plaintiff's Complaint are not justiciable.

Respectfully submitted April 22, 2025.

/s/ Hanna Larsen

Stephen Bloch

Laura Peterson

Hanna Larsen

*Attorneys for Proposed Defendant-Intervenor
Southern Utah Wilderness Alliance*

¹ Civil actions seeking judicial review under the Administrative Procedure act are governed by DUCivR 7-4, which states in relevant part that a party may respond to a complaint with a "short and plain statement...admitting or denying that the decision, or any part of it, is arbitrary and capricious or not supported by substantial evidence." [DUCivR 7-4\(b\)\(2\)\(B\)](#).